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*Attorneys for Volkswagen AG and
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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: VOLKSWAGEN “CLEAN DIESEL”
 MARKETING, SALES PRACTICES, AND
 PRODUCTS LIABILITY LITIGATION

MDL No. 2672 CRB (JSC)

**JOINT STIPULATION AND
 [PROPOSED] ORDER REGARDING
 AWARD OF ATTORNEYS’ FEES,
 COSTS AND EXPENSES**

This Document Relates to:

The Honorable Charles R. Breyer

Clendenen v. Volkswagen, No. 18-cv-7040
Coon v. Volkswagen, No. 18-cv-6966
Ortiz v. Volkswagen, No. 18-cv-6951
Riley v. Volkswagen, No. 17-cv-2897
Robertson v. Volkswagen, No. 18-cv-6956
Salzer v. Volkswagen, No. 18-cv-7050
Sanwick v. Volkswagen, No. 17-cv-3032

This Stipulation is entered into by and among the plaintiffs in the above-captioned actions (“Plaintiffs”) and Defendants Volkswagen AG and Volkswagen Group of America, Inc. (“Volkswagen”; together with the Plaintiffs, the “Parties”).

WHEREAS, on March 20, 2023, five law firms—the Knight Law Group LLP (“Knight Law”), Glaser Weil Fink Howard Jordan & Shapiro LLP (“Glaser Weil”), the Center For Constitutional Litigation (“CCL”), the Auto Fraud Legal Center (“AFLC”), and Greines, Martin, Stein & Richland, LLP (“GMSR,” together “Plaintiffs’ Counsel”)—filed motions for attorneys’ fees (ECF Nos. 8140, 8141, and 8143) and for other costs (ECF No. 8142; together, the “Motions”) on behalf of Plaintiffs;

WHEREAS, on June 21, 2023, following briefing, the Court issued an Order Awarding Fees and Costs (ECF No. 8181; the “Order”), in which the Court held that certain fees and costs were recoverable and that certain fees and costs were not recoverable; and

WHEREAS, in the Order, the Court directed the Parties to file a joint proposed order with stipulated awards for each firm consistent with the Court’s Order.

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and among the Parties, through their undersigned counsel, and subject to the approval of the Court, that the total awards for each Plaintiffs’ Counsel are as follows:

Plaintiffs’ Counsel	Fee Award	Cost Award
Knight Law	\$15,955.48	\$15,458.05
Glaser Weil	\$2,834.90	None
CCL	\$782.23	None
AFLC	\$4,755.49	None
GMSR	\$28,730.55	None

IT IS SO STIPULATED.

1 Dated: July 5, 2023

Respectfully submitted,

2
3 /s/ Robert J. Giuffra, Jr.

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PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

Dated: _____, 2023

The Honorable Charles R. Breyer
UNITED STATES DISTRICT JUDGE

ATTESTATION (CIVIL LOCAL RULE 5-1(h)(3))

In accordance with Civil Local Rule 5-1(h)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: July 5, 2023

SULLIVAN & CROMWELL LLP

/s/ William B. Monahan

William B. Monahan